Message

From: Prat, Rachel@Waterboards [Rachel.Prat@waterboards.ca.gov]

Sent: 11/7/2013 11:53:51 PM

To: Fondahl, Lauren [Fondahl.Lauren@epa.gov]; Smith, DavidW [Smith.DavidW@epa.gov]

CC: Dougherty, Mona@Waterboards [Mona.Dougherty@waterboards.ca.gov]; Reed, Charles@Waterboards

[Charles.Reed@waterboards.ca.gov]

Subject: Highlights of Call to discuss Eureka's Parcel M Biosolids Land Application Proposal

Attachments: Parcel M 08-2012.jpg; 20130513 S E Attach3Figure 3 Preliminary Jurisdictional Delineation fron ROWD.pdf; City of

Eureka Parcel M Biosolids Land Application Project Details.docx

Hi Lauren and David,

Thank you so much for taking the time to talk to us last week about the City of Eureka's Parcel M Biosolids proposal it was very much appreciated.

As was discussed, the next step is to set up a conference call between our two agencies, and the City of Eureka.

I have looked at Mona, Charles and my calendars and we are available the following dates and times.

Please let me know if these dates/times would work for you too.

After I hear back from you I will contact the City with our availability and arrange a date and time for the conference call.

Water Board staff availability

Nov. 12th 11:00 to noon; 1:00 to 2:00

Nov. 13th 1:00 to 2:00, 3:00 to 5:00

Nov. 14th 1:00 to 3:30

Nov. 18th 9:00 to 10:00; 1:00 to 2:00

Nov 25th 9:00 to 12:00; 1:00 to 5:00

Nov 26th 9:00 to 12:00; 1:00 to 5:00

I have tried to capture the main points of our discussion below.

I've also attached a document highlighting the details of the project taken from the ROWD application and a site map showing the application area.

Points to discuss with City

Feel that the use of Parcel M as a biosolids land application area is not appropriate due to:

Application area is identified as wetland waters of the U.S.

Application areas proximity and direct link to surface waters including Humboldt Bay and the Elk River.

Shallow seasonally and tidally (?) influenced groundwater depth. (Proposing application when depth to groundwater is 3 feet.)

Will need to do extensive computer modeling to ensure no impact to surface or ground waters.

Need weather pattern analysis to document dry season.

(Average precipitation data for Eureka shows some amount of rain every month)

http://www.weather.com/weather/wxclimatology/monthly/graph/95501

Need to do further analysis on potential impact to surface and ground waters if a rain event occurs within a week of biosolids application.

Application area identified as having poorly drained, fine textured soils. Such soils typically have slow infiltration capacity.

If rainfall exceeds the infiltration rate of the soil then will result in surface water runoff from the application site.

Proposal will not address stockpiled amount of biosolids stored in lagoons, currently 4,000 dry tons.

Proposal has potential to not address projected annual production of 450 dry tons/year either.

Proposing application rate of 3 to 8 dry tons to 65 acre.

Would need to apply at a rate of 7 dry tons/acre or greater to dispose of projected annual production volume.

Please add any points/issues that I might have missed. Thank you again, Rachel

Rachel Prat Environmental Scientist Watershed Protection Division

North Coast Water Quality Control Board www.waterboards.ca.gov/northcoast

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